

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS)	
OF NORTHERN ILLINOIS WELFARE AND)	
PENSION FUNDS,)	
)	
Plaintiffs,)	
)	No. 2016 C 7027
v.)	
)	Judge Feinerman
)	
JEMIKO BATES, Individually and d/b/a)	
BATES TRUCKING COMPANY,)	
an Illinois corporation not in good standing)	Magistrate Judge Finnegan
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on July 8, 2016 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Service was made upon JEMIKO BATES, Individually and d/b/a BATES TRUCKING COMPANY, an Illinois corporation not in good standing on July 13, 2016 and a copy of the proof of service was filed with the court on July 25, 2016.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$4,578.19	Pension
\$2,528.84	Welfare
\$1,250.00	Attorneys fees
<u>\$476.00</u>	Court costs
\$8,833.03	

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment against Defendant, JEMIKO BATES, Individually and d/b/a BATES TRUCKING COMPANY, an Illinois corporation not in good standing, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION AND WELFARE FUNDS in the amount of \$8,833.03.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION AND
WELFARE FUNDS

s/John J. Toomey
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